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Counsel for Defendants
PFIZER INC., PFIZER IRELAND
PHARMACEUTICALS, and
WARNER-LAMBERT COMPANY LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SANDRA HELLGREN, an individual, and
BERNARD A. ORSI, an individual,

Plaintiffs,

v.

PFIZER, INC., a Delaware Corporation, PFIZER
IRELAND PHARMACEUTICALS, an Irish
partnership, WARNER-LAMBERT COMPANY,
formerly a Delaware Corporation, WARNER-
LAMBERT COMPANY LLC, a Delaware
limited liability company, RANBAXY, INC., a
Delaware Corporation, and DOES 1-10,

Defendants.

Civil Action No.: 3:12-cv-0735 (NC) (JSW)

STIPULATION AND ~~PROPOSED~~
ORDER

~~Magistrate Judge Nathanael M. Cousins~~

1 WHEREAS the Notice of Removal of Action from State Court in the above-captioned
2 action was filed on February 15, 2012; and

3 WHEREAS Plaintiffs Sandra Hellgren and Bernard A. Orsi (collectively, "Plaintiffs")
4 served Defendants Pfizer Inc., Pfizer Ireland Pharmaceuticals, and Warner-Lambert Company
5 LLC (collectively, "Pfizer") with a copy of the First Amended Complaint on January 17, 2012;
6 and

7 WHEREAS at least nine other actions have been filed in federal and state courts to date
8 challenging Pfizer's allegedly anticompetitive conduct with regard to Lipitor and its generic
9 competitors. A petition is currently pending before the Judicial Panel on Multidistrict Litigation
10 ("JPML") to transfer and coordinate these related federal actions, including the above-captioned
11 action, pursuant to 28 U.S.C. § 1407. *In re: Lipitor Antitrust Litigation*, MDL No. 2332. A
12 hearing to consider the transfer and coordination of the actions in MDL No. 2332 is set for March
13 29, 2012; and

14 WHEREAS Plaintiffs and Pfizer have met and conferred on this issue in good faith;

15 IT IS HEREBY STIPULATED AND AGREED, by Plaintiffs and Pfizer, through their
16 respective counsel, that the deadline for Pfizer to answer or otherwise respond to Plaintiffs' First
17 Amended Complaint shall be extended to fourteen (14) days after the date the JPML issues a
18 ruling or decision regarding transfer and consolidation of actions in MDL No. 2332. The parties
19 reserve their right to discovery in accordance with the Federal Rules of Civil Procedure and/or
20 Civil Local Rules.

21 Respectfully submitted,

22 Dated: February 24, 2012

23 /s/ Bijal V. Vakil

24 Bijal V. Vakil, Esq.
25 WHITE & CASE LLP
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Counsel for Defendants

- 2 -

PFIZER INC., PFIZER IRELAND
PHARMACEUTICALS, and
WARNER-LAMBERT COMPANY LLC

Dated: February 24, 2012

/s/ Lawrence G. Papale

Lawrence G. Papale, Esq.
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Counsel for Plaintiffs
SANDRA HELLGREN and BERNARD A. ORSI

WHITE & CASE LLP
ATTORNEYS AT LAW
SILICON VALLEY

ATTESTATION CLAUSE

I, Bijal V. Vakil, hereby attest in accordance with General Order No. 45.X that Lawrence G. Papale, Counsel for Plaintiffs has provided his concurrence with the electronic filing of the foregoing document entitled **STIPULATION AND [PROPOSED] ORDER**.

Dated: February 24, 2012

WHITE & CASE LLP


By: /s/ Bijal V. Vakil
Bijal V. Vakil

Counsel for Defendants
PFIZER INC., PFIZER IRELAND
PHARMACEUTICALS, and
WARNER-LAMBERT COMPANY LLC

ORDER

Pursuant to the above Stipulation filed in this action, it is hereby ORDERED that the time within which Defendants Pfizer Inc., Pfizer Ireland Pharmaceuticals, and Warner-Lambert Company LLC may answer or otherwise respond to Plaintiffs' First Amended Complaint is hereby extended to fourteen (14) days after the date the Judicial Panel on Multidistrict Litigation ("JPML") issues a ruling or decision regarding the transfer and coordination of actions in *In re: Lipitor Antitrust Litigation*, MDL No. 2332.

Dated: March 1, 2012



NATHAN M. COUSINS
MAGISTRATE JUDGE JEFFREY S. WHITE
DISTRICT COURT JUDGE